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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA — WESTERN DIVISION

IOLA FAVELL, SUE ZARNOWSKI,
MARIAH CUMMINGS, and AHMAD
MURTADA, *on behalf of themselves and all*
others similarly situated,

Plaintiffs,

v.

UNIVERSITY OF SOUTHERN
CALIFORNIA and 2U, INC.,

Defendants.

Case Nos. 2:23-cv-00846-GW-MAR;
2:23-cv-03389-GW-MAR

STIPULATED CLASS
CERTIFICATION-RELATED
CASE SCHEDULE

STIPULATED CLASS CERTIFICATION-RELATED CASE SCHEDULE

Plaintiffs Iola Favell, Sue Zarnowski, Mariah Cummings, and Ahmad Murtada and Defendant University of Southern California (together, the “Parties”) submit this Stipulated Class Certification-Related Case Schedule in both 2:23-cv-00846-GW-MAR (“*Favell I*”) and 2:23-cv-03389-GW-MAR (“*Favell II*”) pursuant to Section III.C of their November 9, 2023 Joint Status Report. *See Favell I* Dkt. 87. In that Joint Status Report, the Parties and then-Defendant 2U, Inc. jointly proposed that the Parties submit their positions regarding the date for Plaintiffs to file their class certification motion within 14 days of the Court’s ruling on 2U’s Motion to Dismiss, which the Court issued on January 23, 2024. *See Favell I* Dkt. 101; *Favell II* Dkt. 86. Plaintiffs are not amending the complaints at this time in light of the Court’s order on 2U’s Motion to Dismiss.

The Parties jointly propose the following case schedule for certain events related to Plaintiffs’ forthcoming motion for class certification in both *Favell I* and *Favell II*:

| <u>Event</u> | <u>Deadline</u> |
|--|------------------------|
| Plaintiffs’ Motion for Class Certification including declaration(s) of expert witness(es) | July 25, 2024 |
| Defendant’s Response to Plaintiffs’ Motion for Class Certification including declaration(s) of expert witness(es) | September 23, 2024 |
| Defendant’s FRE 702 Motion(s) to Exclude Expert Testimony Submitted in Support of Plaintiffs’ Motion for Class Certification | September 26, 2024 |
| Plaintiffs’ Response(s) to Defendant’s FRE 702 Motion(s) | October 17, 2024 |
| Defendant’s Reply/Replies in Support of Defendant’s FRE 702 Motion(s) | November 12, 2024 |

| | |
|--|-------------------|
| Plaintiffs' Reply in Support of Motion for Class Certification | November 19, 2024 |
| Plaintiffs' FRE 702 Motion(s) to Exclude Expert Testimony Submitted in Support of Defendant's Response to Plaintiffs' Motion for Class Certification | November 22, 2024 |
| Defendant's Response(s) to Plaintiffs' FRE 702 Motion(s) | December 17, 2024 |
| Plaintiffs' Reply/Replies in Support of Plaintiffs' FRE 702 Motion(s) | January 9, 2025 |
| Court Hearing and Oral Argument on Plaintiffs' Motion for Class Certification | January 23, 2025 |

The Parties agree that nothing in this Stipulated Class Certification-Related Case Schedule prevents any party from seeking to introduce supplemental and/or rebuttal expert testimony as allowed by law and applicable court rules.

The Parties further jointly propose the following briefing length-limitation enlargements:

| <u>Event</u> | <u>Length Limitation</u> |
|--|---------------------------------|
| Plaintiffs' Motion for Class Certification | 40 pages |
| Defendant's Response to Plaintiffs' Motion for Class Certification | 40 pages |
| Plaintiffs' Reply in Support of Motion for Class Certification | 19 pages |

**STIPULATED AND AGREED TO BY THE FOLLOWING COUNSEL OF
RECORD:**

Dated: February 6, 2024

Respectfully submitted,

/s/ Spencer S. Hughes

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Dated: February 6, 2024

Respectfully submitted,

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SIGNATURE CERTIFICATION

I, Spencer S. Hughes, hereby attest pursuant to Civil Local Rule 5-4.3.4 that all other signatories listed, and on whose behalf this filing is submitted, concur in the contents of this filing and have authorized the filing.

Dated: February 6, 2024

/s/ Spencer S. Hughes
Spencer S. Hughes